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July 3, 2024

**MEMO ENDORSED**

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**BY ECF**

The Honorable Valerie E. Caproni  
United States District Court  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

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**Re: *Reclaim the Records and Alec Ferretti v. United States Department of State, No. 23 Civ. 1529 (VEC)***

Your Honor:

I am a partner at Beldock Levine & Hoffman LLP. Mr. Benjamin Meyers, the author of the Plaintiffs' papers, was just released from Bellevue Hospital on Monday night. On June 24<sup>th</sup> he went for an examination at Gouverneur Hospital because his shortness of breath was getting worse. They performed tests and determined that Mr. Meyers needed to be in the care of a cardiologist immediately. He was then transferred to Bellevue where he remained for the last week. Mr. Meyers long term prognosis is good, but as he was just released from the Hospital, it is likely to take a couple of weeks for him to be back to full strength.

We respectfully request a 30-day extension of time reply to the Government's opposition to our cross-summary judgment motion. The Government consents to this request. This will allow Mr. Meyers to complete the briefing on this matter, or if he is unable, for another attorney to get up to speed and complete the briefing.

We apologize for the inconvenience this causes to the Court and the parties. Should this request be granted, the plaintiffs' reply would be filed by August 2, 2024. Presently, the reply is due today, July 3, 2024.

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We thank the Court for its attention to this matter.

Respectfully submitted,



David B. Rankin

Application GRANTED. Plaintiffs' reply brief is due **August 2, 2024**. No further extensions will be granted absent extraordinarily good cause.

SO ORDERED.



07/03/2024

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE